



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

Mr. Joseph Ditty  
Pretreatment Coordinator  
Municipal Sanitary Authority for the City of New Kensington  
120 Logans Ferry Road  
New Kensington, Pennsylvania 15068-2046

Re: Pretreatment 2010 Annual Report  
NPDES No. PA0027111

Dear Mr. Ditty:

Thank you for arranging for the submission of the City of New Kensington's annual pretreatment report for calendar year 2010 on March 24, 2011 by Hatch Mott MacDonald. Due to Liz Ottinger's heavy workload, I am reviewing this Report. Liz will still be your main contact at EPA for pretreatment. Also, EPA appreciates the submittal of the monitoring data in electronic form. The only comments I have are related to the Measures of Success.

In reviewing the 2010 annual reports, EPA has continued the program in which specific pretreatment implementation items for each approved program are being tracked. For calendar year 2010, no significant changes were made to the measures. Enclosed is a sheet that includes the data that I have collected for the New Kensington pretreatment program for calendar year 2010, as well as a sheet that provides some additional information on the categories listed. An AInstruction Sheet@ that provides more detail on each measure (with any clarifications from the 2009 measures indicated in bold) is also enclosed. Generally, the category ratings are not directly related to compliance, but ACategory 1@ would be considered the best rating for each measure. Finally, a summary of all of the POTW data collected so far for calendar year 2009 has been included to allow you to compare your program to the ratings achieved by POTWs in calendar year 2009.

An explanation for the measures in which category 2 or 3 was determined follows:

**Measure No. 3 - Sludge Results** – Category 3 is assigned for nickel because all four sample results exceeded the sludge goal of 420 mg/kg. In addition, three of the four zinc results exceeded the zinc sludge goal. See the footnotes on the Measures sheet and see enclosure 5, which is a report that is a download from our pretreatment database and is based on the data you provided electronically.

**Measure No. 4 - Data/local limits Evaluation** – Category 3 is assigned for the nickel sludge exceedances listed above. It appears that the source of nickel may be a nickel plating operation. It was determined that New Kensington did not use sludge protection criteria in determining the local limits.

**Measure No. 6 - Compliance with other NPDES limits** – Category 2 was assigned based on a fecal coliform violation in November. Category 2 was selected over category 3 since IU discharges generally do not cause this type of violation; however, you are reminded that the report should indicate the cause of all NPDES violations.

**Measure No. 8 – SIU SNC rate** – Category 2 was assigned based on the determination that **16.7%** (1/6) SIUs were in SNC during this reporting period.

**Measure No. 19 - Overall Program rating** – The overall rating for 2010 was **87.0%**. This rating is designated as Category 2.

Please review this information. If you have any questions regarding this matter, please contact Liz at 215-814-5783 or me at (215) 814-5792.

Sincerely,

Stephen G. Copeland  
NPDES Permits and Enforcement (3WP41)  
Water Protection Division

Enclosures

cc: Linda French, Hatch Mott MacDonald (w/enclosures)  
Sam Harper, PADEP Southwest Region (w/out enclosures)  
Sean Furjanic, PADEP-Central Office (w/o enclosures)